

HANNYE LLC

A PENNSYLVANIA LLC WITH LAW OFFICES IN
HADDONFIELD, NJ AND BALA CYNWYD, PA

Richard S. Hannye
Managing Attorney
Admitted in NJ, PA, DC
Email hannye@hannye.pro

128 West Cottage Avenue
Haddonfield, NJ 08033
856 428 1775
Fax 856 428 1919

July 23, 2013

**ELECTRONICALLY FILED VIA COURT'S ECF
SYSTEM WITH COURTESY COPY BY REGULAR MAIL**

Chief Judge Jerome B. Simandle
Mitchell H. Cohen Building & U.S. Courthouse
1 John F. Gerry Plaza, Room 6010
P.O. Box 888
Camden, New Jersey 08101-0888

**Re: Fred Adami and Jack Varner v. Cardo Windows, Inc. d/b/a "Castle 'The
Window People'", et al
Docket No. 1:12-cv-02804-JBS-JS**

Dear Chief Judge Simandle:

Plaintiffs' class certification motion was filed on June 14, 2013 and defendants' original response date was July 1, 2013. Defendants obtained a three week extension until July 22, 2013 and have now requested another two week extension until August 5, 2013. In total, defendants will have had over seven weeks to respond to plaintiffs' motion making it likely that it will be lengthy and complex. Accordingly, plaintiffs respectfully request a three week period to file their reply to defendants' response. If defendants' response is due on August 5, 2013, this would make defendants' reply due on August 26, 2013.

While plaintiffs do not object to the two week extension requested by defense counsel, plaintiffs do contest the premise for the extension. Specifically, the documents to be produced by defendants do not change the number of persons who install windows for the defendants. As Magistrate Judge Schneider noted on the record at the July 18, 2013 discovery hearing, defendants know how many persons install windows for them. In short, the only reason that defendants' response brief should change based upon the production of 1099s issued to its installers is if defendants brief misrepresented the number of installers to begin with.

Furthermore, Judge Schneider's July 11, 2013 Discovery Order does not require defendants to produce voluminous documents. Defendants are required to produce by July 25, 2013, tax returns and 1099s issued to its installers from 2009 to present; one "job packet" for Fred Adami; and one "job packet" for Jack Varner. The contents of a "job packet" are identified in plaintiffs' certification, paragraph 94, and typically consist of less than 10 pages per "job packet".

HANNYE LLC

A PENNSYLVANIA LLC WITH LAW OFFICES IN
HADDONFIELD, NJ AND BALA CYNWYD, PA

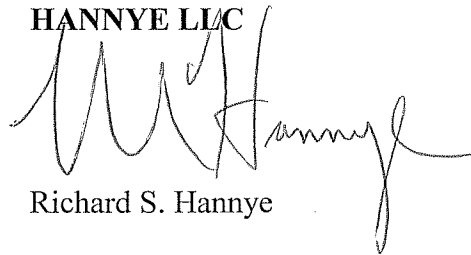
July 23, 2013

Page Two

Thank you for your time and consideration.

Very truly yours,

HANNYE LLC

A handwritten signature in black ink, appearing to read 'R. Hannye', written over the printed name 'Richard S. Hannye'.

Richard S. Hannye

RSH:dd

cc: Michael Homans, Esquire (via electronic filing)